

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

IN THE MATTER OF)
BROOKE M. CRUMP)
,)
DISCIPLINARY ACTION IN THE UNITED)
STATES DISTRICT COURT FOR THE)
MIDDLE DISTRICT OF NORTH CAROLINA)

1:22MC27

Respondent, Attorney Brooke M. Crump, replies to this Honorable Court's order for her to show cause as to why imposition of why imposition of the identical discipline by this court would be unwarranted with the following:

1. On July 13, 2022, North Carolina State Bar Investigators Paul Sugrue and Fred Patton served Respondent with a Letter of Notice and Subpoena for Cause (Exhibit A) in Stanly County District Criminal Court.
2. Movant initially ordered Respondent's time for compliance as August 1, 2022, at 10:00 AM.
3. On July 25, 2022, Respondent's husband was unexpectedly admitted to Moore Regional Hospital for heart surgery after his pacemaker/I.D.C. malfunctioned, making the time for compliance unduly burdensome for Respondent.
4. On July 26, 2022, Respondent notified the North Carolina State Bar of the same by email and requested an extension for the grievance and the factors contributing to the subpoena being unduly broad and overly burdensome. (Exhibit B).
5. Deputy Counsel, Carmen Bannon, responded via email, to which Respondent replied. (Exhibit C)

6. Her reply included the attached Grievance as filed by P.L. but stated Respondent was not entitled to receive related attachments.
7. The grievance filed by P.L. as Respondent received it (Exhibit D) did not involve Respondent's trust account, but the subpoena for cause required Respondent to produce four years of her trust account records.
8. Deputy Counsel, Cameron Lee, extended the date for compliance until August 12, 2022.
9. Respondent submitted her full and complete response, along with all relevant trust account records for Grievance File no. 22G0357 to the North Carolina State Bar on August 12, 2022. (Exhibit E)
10. Nonetheless, the Disciplinary Hearing Commission issued an order for Respondent to show cause why her law license should not be suspended as required by the rules upon the North Carolina State Bar's motion.
11. Respondent appeared before the DHC on September 14, 2022, the transcript for which hearing is attached as Exhibit F.
12. At the conclusion of the hearing, Chairman Davis stated, "regarding what's going on in your personal situation with your husband when all of this was coming and you were trying to comply" implying there was good cause for any noncompliance with the State Bar's requests.
13. On September 19, 2022, Respondent submitted thousands of documents to Deputy Counsel as required for her response to the subpoena.
14. Exhibit G is an affidavit Respondent signed on September 19, 2022, indicating her substantial compliance with the subpoena and grievance.

15. Respondent has heard nothing further from the State Bar in regards to Grievance File No. 22G0357.

Respondent asks this honorable court to accept her delayed response to this show cause, whereas the North Carolina State Bar did not serve notice upon Respondent regarding the filing nor was she listed as a party for notice.

16. Respondent discovered the action while searching Pacer.

17. Respondent prays for the privilege to remain in good standing with this honorable court.

Respectfully Submitted, this the 1st day of December 2022.

/s/Brooke M. Crump
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